

The newly posted petition (04Sep2003) for a decision of inconsequential noncompliance from Toyota should be flatly rejected by NHTSA. In order to avoid a costly recall, Toyota attempted to show that the DRL implementation on the 2000-2001 Camry is acceptable in terms of turn signal visibility. However, judging from the feedback from the subjects of their study, "acceptable" is not a term which can be applied to their findings. Whereas most of the results are in the "fair" range on their rating scale, I would suggest that given that DRLs have no measurable safety benefit, then every effort must be made to optimize those vehicle lighting systems that are beneficial to safety, particularly the turn signals. Using Toyota's scale, "fair" is simply not good enough. The ratings should be in the "good" to "very good" range.

Toyota presents a "remodeled" solution which somehow is less functional than the current implementation in terms of signal visibility. However, what Toyota did not present is the simplest solution of all: where the DRL is disconnected. By eliminating the excessively intense light source in the vicinity of the turn signal, the amber lamp will be easily seen. I'm not talking about interrupting the DRL function as was done with the GM S-series, as this leads directly to an extreme annoyance of other drivers! Because DRLs are not required in the US, Toyota can simply recall the vehicles and disable the DRL function.

Given the weak findings of the recent Tessmer presentation, NHTSA should not grant an exemption to dangerous DRL implementations and Toyota must be forced to recall the 92,794 vehicles with the defective implementation. Furthermore, NHTSA should require that Toyota submit data for the later model years of the Celica to ensure compliance with DRL specifications in FMVSS 108.

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